

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S  
UNOPPOSED MOTION TO IMPOUND/SEAL DESIGNATED MATERIAL**

Pursuant to Local Rule 7.2 and the Order entering the Protective Order in this case (“Protective Order”), ECF No. 87, Defendant Google LLC (“Google”), respectfully requests the Court to impound (seal) an un-redacted copy of (1) its Memorandum of Law in Support of Google’s Opposition to Singular’s Motion for Partial Summary Judgment, and (2) excerpts from the deposition transcript of Daniel Hammerstrom.

Plaintiff Singular Computing LLC (“Singular”) does not oppose this Motion to Impound/Seal.

The Protective Order allows a party to designate documents and deposition transcripts as “Confidential” after making a good-faith determination that the documents and/or deposition transcripts contain information that is “confidential, proprietary, and/or commercially sensitive information.” Protective Order ¶¶ 6-7. The Order further requires that a party intending to make court filings referring to “Confidential” information bring a motion to impound. *Id.* ¶ 14.

Google’s Memorandum of Law contain quotes from and describes the deposition transcript of Daniel Hammerstrom, which Singular has designated as confidential.

Submission of the above-identified confidential version of the Memorandum of Law and excerpts from the deposition transcript of Daniel Hammerstrom is necessary to permit the Court

to fully evaluate the issues raised in Google's Opposition to Singular's Motion for Partial Summary Judgment. Google therefore brings this Motion to Impound to impound the confidential and unredacted versions of the above-identified documents.

For the foregoing reasons, Google respectfully requests that the Court permit it to file the above-identified documents under seal because Singular has taken the position that the deposition testimony quoted contains confidential business information. Google further requests that the documents remain impounded until further order by the Court, and that upon expiration of the impoundment that the documents be returned to Google's counsel.

Respectfully submitted,

Dated: December 9, 2022

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**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I, Nathan R. Speed, counsel for Defendant Google LLC, hereby certify that counsel for Google conferred with Plaintiff's counsel in a good-faith attempt to resolve or narrow the issue raised by this motion. Plaintiff's counsel indicated that it does not oppose the relief requested in this Motion.

/s/ Nathan R. Speed

Nathan R. Speed

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

*/s/ Nathan R. Speed*

Nathan R. Speed